

U.S. DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

COURT JUN - 9 2023

CLERK, U.S. DISTRICT COURT

By _____ Deputy _____

UNITED STATES OF AMERICA

v.

KYUNG HEO (01)

No. 4:23-MJ- 468

CRIMINAL COMPLAINT

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about June 6, 2022, in the Fort Worth Division of the Northern District of Texas, the defendant, Kyung Heo, did intentionally and knowingly by force, violence and intimidation take from the person and presence of K.A, money belonging to and in the care, custody, control, management and possession of a bank, that is, the Citizen's National Bank, 800 Santa Fe Drive Weatherford, Texas, the deposits of which were then insured the deposits of which were then insured by the Federal Deposit Insurance Association (FDIC) In violation of 18 U.S.C. § 2113(a).

I, Cody Johnson (your Affiant), further state that I am a Detective with the Fort Worth Police Department (FWPD) and I am currently assigned as a Task Force Officer with the Federal Bureau of Investigation (FBI), Fort Worth, Texas, and that this Complaint is based upon the following facts:

1. I have been employed as an officer with FWPD since 2009, assigned as a Detective since 2018, and I am currently assigned as a Task Force Officer with the FBI to investigate violations of 18 U.S.C. § 2113, relating to Bank Robbery. The information contained in this affidavit is from my personal knowledge and from information provided by other individuals.

2. On June 6, 2023, a male later identified as Kyung Heo entered the Citizen's National Bank located at 800 Santa Fe Drive Weatherford, Texas. Kyung approached the teller counter, displayed a handgun and began demanding money from victim teller K.A. Kyung then jumped over the lower counter and asked where the vault was located.

3. K.A. was able to press the silent alarm button at her station to activate the banks silent alarm. Tellers began emptying their cash drawers onto the counter. Kyung began collecting the money into a brown sack he brought with him. Kyung then pointed his firearm at the tellers and ordered them to the back wall and to keep their hands in the air.

4. Kyung then left the bank on foot in unknown direction.

5. The total loss from the bank was determined to be \$23,140

6. Weatherford Police Department was notified by the silent alarm, made the scene and made contact with the bank employees. Employees described Kyung as an Asian or Hispanic male about 5'5" 120lbs. wearing a grey brimmed, white mask, sunglasses, sweatshirt with round logo, khaki colored pants.

7. Officers with the assistance of K9 began searching the area and located a male matching the description in a creek running from the area. After a brief chase the male was detained and identified as Kyung.

8. Kyung had a brown sack in his possession that contained \$23,140. Kyung had a BB/Pellet gun in his possession that had been altered to resemble a real firearm. Kyung also had a pocket knife in his possession.

9. Kyung was transported to Weatherford police department where he was read his Miranda Warning. Kyung advised he understood his rights and wished to speak with Detectives. Kyung confirmed he was the actor in this case. He advised he had entered the bank, pulled the BB gun from his waistband and demanded money from the tellers. After collecting the money, he had left the bank. When asked about the knife he had on his person, Kyung advised he wasn't going to rob a bank with a fake gun alone, further adding the knife was in case someone tried intervene or attack him.

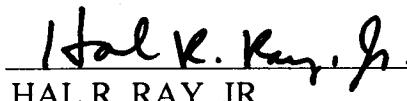
10. Kyung stated he had planned the robbery for approximately one month. He had done research on 5 banks and felt he had the best chance of not being caught at this location.

As such, based upon the aforementioned facts, I believe that Kyung Heo, a male, date of birth 01/13/1994, has committed the offense of Bank Robbery, in violation of 18 U.S.C. § 2113(a).



Task Force Officer Cody Johnson
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence, 9th day of June, 2023, at 10:23 a.m./p.m. in Fort Worth, Texas.



HAL R. RAY, JR.
UNITED STATES MAGISTRATE JUDGE